RQ-2

April 21, 2011

ROB KREMER, TREASURER OREGON REPUBLICAN PARTY PO BOX 25406 PORTLAND, OR 97298

IDENTIFICATION NUMBER: C00153031

Response Due Date 05/26/2011

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/14/2010 - 11/22/2010),

RECEIVED 01/31/2011

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 4 item(s):

1. Schedule A supporting Line 12 discloses a transfer(s)-in from "National Republican Congressional Comm." Schedule B supporting Line 30(b) reflects payments for "Vol Exempt Print & Mail - General," "Vol Exempt Printing -General" and "Vol Exempt Postage - General." Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election and for voter drive activity conducted on behalf of the party's Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of 'exempt' activity as described above and if any portion of the expenditures were made on behalf of specifically identified

OREGON REPUBLICAN PARTY

Page 2 of 3

candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate.

- 2. Schedule H4 supporting Line 21(a) of your report discloses \$10,075.62 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is <u>not</u> included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity.
- **3.** Schedule H4 discloses reimbursements to individuals totaling \$3,500. However, the sum of the memo entries provided identifying the original vendors associated with these payments total \$3,610. Please amend your report to clarify this discrepancy.
- **4.** Please clarify all expenditures made for "Event Space" on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

Alternatively, if the payment(s) on Schedule H4 is associated with fundraising activity conducted for your committee's federal and non-federal accounts, it must be allocated according to the funds received method and the ratio reflected on Schedule H2. Further, it must be categorized as a fundraising activity on Schedule H4. Please provide clarifying information regarding the nature of this transaction(s) and amend your report(s) as appropriate.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

OREGON REPUBLICAN PARTY

Page 3 of 3

contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1172.

Sincerely,

Alexandra Broomhead Senior Campaign Finance Analyst Reports Analysis Division

314